

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DEBORAH FRAME-WILSON, *et al.*, on behalf of themselves and all other similarly situated,

No. 2:20-cv-00424-JHC

STIPULATED MOTION AND
ORDER FOR APPOINTMENT OF A
SPECIAL MASTER

AMAZON.COM, INC., a Delaware corporation,

Defendant.

ELIZABETH DE COSTER, *et al.*, on behalf of
themselves and all other similarly situated,

No. 2:21-cv-00693-JHC

AMAZON.COM, INC., a Delaware corporation,

Defendant.

CHRISTOPHER BROWN, *et al.*, on behalf of
themselves and all others similarly situated,

No. 2:22-cv-00965-JHC

Plaintiffs,

V.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

STIP. MOT. & ORDER RE
APPOINTMENT OF A SPECIAL MASTER
(No. 2:20-cv-00424-JHC; No. 2:21-cv-00693-JHC; No. 2:22-cv-00965-JHC)

The Parties submit this Proposed Order pursuant to the Court's Order selecting a Special Master, establishing the Special Master's authority, and establishing a protocol for raising privilege disputes. Case No. 21-693, Dkt. # 381; Case No. 20-424, Dkt. # 352; Case No. 22-965, Dkt. # 220. Accordingly, the Parties, and their respective counsel, hereby stipulate and agree, and request an order establishing the following:

1. The Court APPOINTS the Honorable Elizabeth D. Laport (Ret.) as the Special Master in these matters.
2. The Special Master will file a declaration under 28 U.S.C. § 455 confirming there are no grounds for disqualification.
3. The Special Master's authority, and other provisions of the Special Master process, are set forth in the Court's Order of July 7, 2025. Case No. 21-693, Dkt. # 381; Case No. 20-424, Dkt. # 352; Case No. 22-965, Dkt. # 220.

IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

DATED July 9, 2025. Respectfully submitted,

HAGENS BERMAN SOBOL SHAPIRO LLP

By: /s/ Steve W. Berman
Steve W. Berman (WSBA No. 12536)
By: /s/ Barbara A. Mahoney
Barbara A. Mahoney (WSBA No. 31845)
1301 Second Avenue, Suite 2000
Seattle, WA 98101
Telephone: (206) 623-7292
Facsimile: (206) 623-0594
E-mail: steve@hbsslaw.com
barbaram@hbsslaw.com

Anne F. Johnson (*pro hac vice*)
594 Dean Street, Suite 24
Brooklyn, NY 11238
Telephone: (718) 916-3520
E-mail: annej@hbsslaw.com

1 KELLER POSTMAN LLC
2

3 Zina G. Bash (*pro hac vice*)
4 111 Congress Avenue, Suite 500
5 Austin, TX, 78701
6 Telephone: (512) 690-0990
7 E-mail: zina.bash@kellerpostman.com
8

9 Jessica Beringer (*pro hac vice*)
10 Alex Dravillas (*pro hac vice*)
11 Shane Kelly (*pro hac vice*)
12 150 North Riverside Plaza, Suite 4100
13 Chicago, Illinois 60606
14 Telephone: (312) 741-5220
15 E-mail: Jessica.Beringer@kellerpostman.com
16 E-mail: ajd@kellerpostman.com
17 E-mail: shane.kelly@kellerpostman.com
18

19 *Interim Co-Lead Counsel for Plaintiffs and the*
20 *proposed Class*
21

22 QUINN EMANUEL URQUHART &
23 SULLIVAN, LLP
24

25 By: /s/ Alicia Cobb
26 Alicia Cobb, WSBA # 48685
27 1109 First Avenue, Suite 210
Seattle, WA 98101
Telephone: (206) 905-7000
Email: aliciacobb@quinnemanuel.com

28 Steig D. Olson (*pro hac vice*)
29 David D. LeRay (*pro hac vice*)
30 Nic V. Siebert (*pro hac vice*)
31 Maxwell P. Deabler-Meadows (*pro hac vice*)
32 Elle Mahdavi (*pro hac vice*)
33 295 Fifth Ave.
34 New York, NY 10016
35 Telephone: (212) 849-7000
36 Email: steigolson@quinnemanuel.com
37 Email: davidleray@quinnemanuel.com
38 Email: nicolassiebert@quinnemanuel.com
39 Email: maxmeadows@quinnemanuel.com
40 Email: ellemahdavi@quinnemanuel.com
41
42

1 Adam B. Wolfson (*pro hac vice*)
2 865 South Figueroa Street, 10th Floor
3 Los Angeles, CA 90017-2543
4 Telephone: (213) 443-3000
5 Email: adamwolfson@quinnmanuel.com

6
7 *Interim Executive Committee for Plaintiffs and the*
8 *proposed Class*
9

10 DAVIS WRIGHT TREMAINE LLP
11

12 By /s/ John A. Goldmark
13 John A. Goldmark, WSBA # 40980
14 MaryAnn Almeida, WSBA #49086
15 920 Fifth Avenue, Suite 3300
16 Seattle, WA 98104-1610
17 Telephone: (206) 622-3150
18 Email: johngoldmark@dwt.com
19 Email: maryannalmeida@dwt.com
20

21 DUNN ISAACSON RHEE LLP
22

23 Karen L. Dunn (*pro hac vice*)
24 William A. Isaacson (*pro hac vice*)
25 Amy J. Mauser (*pro hac vice*)
26 Kyle Smith (*pro hac vice*)
27 401 Ninth Street, NW
Washington, DC 20004-2637
Telephone: (202) 240-2900
E-mail: kdunn@dirllp.com
E-mail: wisaacson@dirllp.com
E-mail: amauser@dirllp.com
E-mail: ksmith@dirllp.com

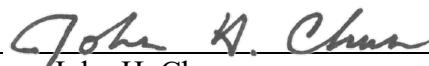
28 Meredith Dearborn (*pro hac vice*)
29 345 California Street
30 Suite 600
31 San Francisco, CA 94104-2671
32 Telephone: (202) 240-2900
33 E-mail: mdearborn@dirllp.com
34

35 *Attorneys for Amazon.com, Inc.*
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1 IT IS SO ORDERED.
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4 July 9, 2025
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Dated



John H. Chun
United States District Judge